

**From:** Jose Torres <Torres.Jose@epamail.epa.gov>  
**Sent:** Friday, January 30, 2015 12:17 PM  
**To:** Torres, Jose  
**Subject:** Fw: Comments on Status of TCEQ's Delegated UIC Program Review  
**Attachments:** 121107tceqUICprogramReviewDiscussion-TexCom\_03.ppt

----- Forwarded by Jose Torres/R6/USEPA/US on 01/30/2015 12:07 PM -----

From: Jose Torres/R6/USEPA/US  
 To: "Lorrie Council" <[lorrie.council@tceq.texas.gov](mailto:lorrie.council@tceq.texas.gov)>,  
 Cc: Ray Leissner/R6/USEPA/US@EPA, Philip Dellinger/R6/USEPA/US@EPA, Stacey Dwyer/R6/USEPA/US@EPA, Wren Stenger/R6/USEPA/US@EPA, William Honker/R6/USEPA/US@EPA, David Gillespie/R6/USEPA/US@EPA  
 Date: 11/15/2012 09:04 AM  
 Subject: Comments on Status of TCEQ's Delegated UIC Program Review

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Sorry for the mix-up Ms. Lorrie. My previous message went out with the wrong attachment. Here is what I intended to share. I apologize for the confusion.

JETorres

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Hello Ms. Lorrie:

It was a pleasure meeting you during the UIC program review meeting of October 12, 2012 in Austin. It is always nice to be able to put a face with a name, and a voice too, of course.

It has been now a little over 30 days since that meeting was held, and I had hoped that by now we would have been able to continue our discussions on the delegated program's Review Reports. If I understood you correctly, you wanted the opportunity to provide EPA some comments; I understood that you, Ms. Goss and the rest of your team would like to provide them, but I am not aware that this has happened yet.

In light of the above, I am writing today to see if we can get the wheels rolling again on this matter, aiming at having the Review Reports all completed before the holidays, within the next 30 days perhaps?.

Since the permit issued by TCEQ to TexCom to operate a Class I non-hazardous disposal well in Montgomery County, the WDW-410 well, is one of the most outstanding sources for the comments in the Review Reports that you and your team have objected to, I thought that it might be helpful to our discussions to have in front of us some tangible reference to the nuts and bolts of the oversight exercise that Region 6 executed in connection with the technical evaluation of the permit application.

The attached PPT file is the result of an effort to communicate to all of you where the Region is coming from when asserting that the TexCom permit is problematic. The assessment of the parameters and the methodology used in the Region's evaluation are mostly the result of my input into this project, and they have been previously communicated to my superiors.

In working on this oversight exercise, I have resorted to most of the principles and practices that I have become familiar with in more than forty years of engineering practice, and can only hope that none of my findings appear insulting to anyone (smile). We (and I am sure that all of you too) are just trying to carry out the Agency's mission of protecting human health and the environment to the best of our ability, as objectively as data allow.

I am confident that the results I have illustrated reflect the best available technology for this type of “back of the envelope” evaluation. However, not being a law major, I acknowledge that there may be details that I may have missed because they can be better explained from an attorney’s point of view. Hopefully, we are going to work collaboratively in finding common ground to be able to objectively address any wrongs, and to be able to finalize Review Reports that are true to the state of the TCEQ delegated UIC program.

Please feel free to call/e-mail me if you have questions/comments regarding this message. Again, I hope that we can get the wheels rolling one more time, and can soon finalize the task at hand. Best regards,

José Eduardo Torres  
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EPA, Region 6  
(214) 665-8092

*(See attached file: 121107tceqUICprogramReviewDiscussion-TeXCom\_03.ppt)*